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15 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA

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17 IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR
MDL No. 3047

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19 This Document Relates to:

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21 *ALL CASES*

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**STIPULATION AND [PROPOSED] ORDER
RE SNAP'S OMNIBUS MOTION TO SEAL
(PLAINTIFFS' OMNIBUS OPPOSITION
BRIEF AND NON-EXHIBIT MATERIALS)**

Pursuant to Civil Local Rule 7-12, Plaintiffs and Snap Inc. (“Snap”, and together, the “Parties”) by and through their counsel of record hereby stipulate as follows:

WHEREAS, on December 10, 2025, Snap filed an Omnibus Motion to Seal (Plaintiffs’ Omnibus Opposition Brief and Non-Exhibit Materials) (“Snap’s Motion to Seal”) (ECF No. 2531) seeking to seal portions of certain exhibits filed with this Court in connection with Plaintiffs’ Rule 702 and Summary Judgment Oppositions;

WHEREAS, on December 17, 2025, the Parties met and conferred further in an effort to resolve outstanding differences and avoid the need for further motion practice;

WHEREAS, after meeting and conferring, Snap agreed to withdraw its request to redact and seal a Snap employee’s name identified on Page 96 of the Expert Report of Dimitri A. Christakis, M.D., M.P.H. (ECF Nos. 2400-18, 2405-18, 2407-03) (“Christakis Report”) and on Page 46 of the Expert Report of Anna Lembke, M.D. (ECF Nos. 2405-13, 2407-05) (“Lembke Report”), as well as Twitter user names contained in an embedded image on Page 97 of the Christakis Report;

WHEREAS, with this adjustment, Plaintiffs do not object to the remainder of the requests in Snap’s Motion to Seal;

THEREFORE, the Parties Stipulate and seek an Order dismissing as moot Snap’s pending Motion to Seal and, upon good cause showing, as follows:

Document	Portion to be Sealed	Basis for Sealing	Whether Previously Sealed	Court’s Order
Plaintiffs’ Opposition to Defendants’ Harford Motion for Summary Judgment - Christakis MDL expert report (Exhibit 16, ECF No. 2400-18)	Page 147: Employee name; Twitter user name	There is good cause to seal these non-deponent employee names to protect their privacy interests at this time. <i>See, e.g., Murphy v. Kavo Am. Corp.</i> , 2012 WL 1497489, at *1, *2 (N.D. Cal. Apr. 27, 2012) (granting motion to seal “employee-identifying information” because “[e]mployees and former employees who are not parties to this litigation have privacy	To Snap’s knowledge, no party has previously sought to seal this information.	Granted ____ Denied ____

Document	Portion to be Sealed	Basis for Sealing	Whether Previously Sealed	Court's Order
		<p>interests in their personnel information, and in other sensitive identifying information") (Gonzalez Rogers, J.); <i>see also, e.g., Am. Auto. Ass'n of N. California, Nevada & Utah v. Gen. Motors LLC</i>, 2019 WL 1206748, at *2 (N.D. Cal. Mar. 14, 2019); <i>Opperman v. Path, Inc.</i>, 2017 WL 1036652, at *4 (N.D. Cal. Mar. 17, 2017); <i>Hunt v. Cont'l Cas. Co.</i>, 2015 WL 5355398, at *2 (N.D. Cal. Sept. 14, 2015). Sealing this information is consistent with the Court's approach to sealing employee names in the Personal Injury Plaintiffs' Master Complaint and the multistate Attorney General Complaint. <i>See ECF No. 189</i>; Case No. 4:23-cv-05448-YGR, ECF No. 77. Sealing this information is further warranted to protect the employees' safety. <i>Cf. Campbell v. Grounds</i>, 2022 WL 14151744, at *1 (N.D. Cal. Oct. 24, 2022) (sealing witness name and finding standard met when disclosure "could put at risk the safety of one or more individuals if made public"); <i>see also</i> Declaration of Jennifer Boden ¶¶ 2–4.</p> <p>There is also good cause to seal the names of these non-party, non-employees. These individuals enjoy the same privacy and other interests as the non-deponent employees discussed above. <i>See Foltz v. State Farm Mut. Auto. Ins. Co.</i>, 331 F.3d 1122, 1137 (9th Cir. 2003) (referring broadly to "third-party" privacy interests in redacting); <i>Am. Auto. Ass'n</i>, 2019 WL 1206748, at *2 (same);</p>		

Document	Portion to be Sealed	Basis for Sealing	Whether Previously Sealed	Court's Order
		<i>Opperman</i> , 2017 WL 1036652, at *4 (similar). The personal information of these third parties is irrelevant to the issues before the Court and redacting them is necessary to protect these individuals' privacy. <i>See</i> Declaration of Laura M. Lopez ¶ 2.		
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts - Christakis MDL expert report (Exhibit 15, ECF No. 2405-18)	Page 147: Employee name; Twitter user name	See above	To Snap's knowledge, no party has previously sought to seal this information.	Granted _____ Denied _____
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts - Lembke MDL Expert Report (Exhibit 10, ECF No. 2405-13)	Page 47: Employee names	See above	To Snap's knowledge, no party has previously sought to seal this information.	Granted _____ Denied _____

Document	Portion to be Sealed	Basis for Sealing	Whether Previously Sealed	Court's Order
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts - Lembke MDL Expert Report (Exhibit 10, ECF No. 2405-13)	Page 54: Employee name	See above	To Snap's knowledge, no party has previously sought to seal this information.	Granted _____ Denied _____
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts - Murray MDL Expert Report (Exhibit 32, ECF No. 2405-35)	Page 169: Employee name	See above	To Snap's knowledge, no party has previously sought to seal this information.	Granted _____ Denied _____
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts - Deposition of Stuart Murray, June 19, 2025 (Exhibit 30, ECF No. 2405-33)	504:1 Employee name	See above	To Snap's knowledge, no party has previously sought to seal this information.	Granted _____ Denied _____

Document	Portion to be Sealed	Basis for Sealing	Whether Previously Sealed	Court's Order
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts - Deposition of Stuart Murray, June 19, 2025 (Exhibit 30, ECF No. 2405-33)	504:8 Employee name	See above	To Snap's knowledge, no party has previously sought to seal this information	Granted _____ Denied _____
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' School District Experts - Christakis MDL expert report (Exhibit 1, ECF No. 2407-03)	Page 147: Employee name; Twitter user name	See above	To Snap's knowledge, no party has previously sought to seal this information.	Granted _____ Denied _____
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' School District Experts - Lembke MDL Expert Report (Exhibit 3, ECF No. 2407-05)	Page 47: Employee names	See above	To Snap's knowledge, no party has previously sought to seal this information.	Granted _____ Denied _____

Document	Portion to be Sealed	Basis for Sealing	Whether Previously Sealed	Court's Order
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' School District Experts - Lembke MDL Expert Report (Exhibit 3, ECF No. 2407-05)	Page 54: Employee name	See above	To Snap's knowledge, no party has previously sought to seal this information.	Granted _____ Denied _____

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATE: _____

Hon. Yvonne Gonzalez Rogers

Dated: December 17, 2025

Respectfully submitted,

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8 ***SIGNATURE CERTIFICATION***

9 Pursuant to Civ. L.R. 5-1(i)(3), I hereby attest that all signatories listed, and on whose
10 behalf the filing is submitted, concur in this filing's content and have authorized this filing.

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13 Dated: December 17, 2025

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